

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR., on  
behalf of himself and all others  
similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS  
AMERICA, INC.,

Defendant.

Civil Action No. 17-01775 (MCA) (JSA)

Hon. Madeline Cox Arleo, U.S.D.J.

Hon. Jessica S. Allen, U.S.M.J.

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**DECLARATION OF LESLEY E. WEAVER IN SUPPORT OF  
PLAINTIFFS' REPLY BRIEF IN SUPPORT OF RENEWED MOTION  
FOR ISSUANCE OF A LETTER OF REQUEST FOR PRODUCTION OF  
DOCUMENTS AND DEPOSITION TESTIMONY**

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I, Lesley E. Weaver, hereby declare as follows:

1. I am a partner at the law firm of Bleichmar Fonti & Auld LLP, counsel for Plaintiff Thomas Roger White, Jr. in the above-named matter. I am admitted *pro hac vice* before this Court. Unless otherwise stated, the facts below are based on my own personal knowledge, and if called upon to testify, I could and would competently testify thereto.

2. On September 15, 2023, the parties appeared before the Court for a status conference. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the transcript of that status conference.

3. On January 12, 2024, the parties appeared before the Court for a status conference. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the transcript of that status conference.

4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts of the transcript of the April 8, 2024 deposition of Stewart Farr.

5. On April 16, 2024, the parties appeared before the Court for a status conference. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the transcript of that status conference.

6. Attached hereto as **Exhibit E** is a true and correct copy of excerpts of the transcript of the April 15, 2024 deposition of Plaintiff Thomas Roger White, Jr.

7. Attached hereto as **Exhibit F** is a true and correct copy of excerpts of the April 11, 2024 deposition of Khaled Abuali.

8. Attached hereto as **Exhibit G** is a true and correct copy of excerpts of the transcript of the May 1, 2024 deposition of Randy Chung.

9. Attached hereto as **Exhibit H** is a true and correct copy of excerpts of the April 10, 2024 deposition of Justin Evans.

10. Attached hereto as **Exhibit I** is a true and correct copy of SEA's First Amended Initial Disclosures, served on July 21, 2023.

11. On May 15, 2024, Plaintiffs served a subpoena on Gracenote, Inc. and on May 16, 2024, Plaintiffs served a subpoena on Roku, Inc. ("Roku"). Attached

hereto as **Exhibit J** is a true and correct copy of emails between general counsel for Nielsen, Gracenote's parent corporation, and Plaintiffs' counsel.

\* \* \*

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 20, 2024

/s/ Lesley E. Weaver  
Lesley E. Weaver